

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

**UNITED STATES OF AMERICA**

**Plaintiff**

**vs.**

**Michael C. Dunn**

**Defendant**

**CIVIL NO.**

**COMPLAINT**

The United States of America, on behalf of its Agency, the department of Transportation, by its specially appointed counsel KML Law Group, P.C., represents as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. 1345.
2. The last-known address of the Defendant, Michael C. Dunn, is 2 Sprague Landing, Turnersville, NJ 08012.
3. Defendant owes Plaintiff the principal sum of \$223,254.00, plus interest of \$379.23, for a total of \$223,633.23. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “A” (“Certificate of Indebtedness”).
4. Demand has been made upon Defendant by Plaintiff for the sum due but the amount due remains unpaid.

WHEREFORE, the plaintiff demands judgment against Defendant as follows;

- (A) In the amount of \$223,633.23 with interest from November 13, 2019.

(B) Plus filing fee allowed pursuant to 28 U.S.C., Section 1914 in the sum of \$150.00.

(C) Interest to accrue at the rate of 1% to the date of judgment.

(D) Interest from the date of judgment at the legal rate of interest in effect on the date of judgment until paid in full.

(E) Costs of suit.

Notice is hereby given to Defendant that Plaintiff intends to seek satisfaction of any judgment rendered in its favor in this action from any debt accruing.

United States of America by and through  
Its specially assigned counsel  
KML Law Group, P.C.

/s/Rebecca A. Solarz, Esq.

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**EXHIBITS**

**“A” CERTIFICATE OF INDEBTEDNESS**